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February 25, 2020

Via ECF

Hon. Katherine Polk Failla, USDJ
Southern District of New York
40 Foley Square, Room 2103
New York, NY 1007

MEMO ENDORSED

Re: Smith v. NJ Labor Solutions LLC et al. No 19-00774-KPF

To the Hon. Failla:

I represent plaintiff Jason Smith ("Plaintiff") in the above-referenced action. I write to provide a status report concerning Plaintiff's intentions with respect to the prosecution of this action.

Plaintiff is in the process of finalizing a settlement with two out of the three defendants, namely Hayden Murren and NJ Labor Solutions LLC. We expect to submit the settlement for approval in three weeks. After submitting the agreement for approval, Plaintiff then intends on submitting a letter seeking default against the third and final defendant, namely Anson S. Barrow.

Accordingly, Plaintiff respectfully requests that the pretrial conference scheduled for February 27, 2020 be adjourned. This conference was scheduled to address outstanding discovery between Plaintiff and defendants Hayden Murren and NJ Labor Solutions LLC. Now that a settlement in principle has been reached with those defendants, Plaintiff submits the conference should be adjourned to provide the parties enough time to finalize the settlement agreement and submit the agreement for court approval. No prior requests have been made to adjourn this conference. I have conferred with defendants Hayden Murren and NJ Labor Solutions LLC and they consent to this request.

As always, I thank the Court for its time and consideration.

Respectfully Submitted,

/s/ Mohammed Gangat
Mohammed Gangat, Esq.

Application GRANTED. The initial pretrial conference currently scheduled for February 27, 2020, is hereby ADJOURNED *sine die*. Plaintiff is hereby ORDERED to file a status update with the Court on or before March 25, 2020.

Dated: February 25, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE